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January 29, 2019

## Via ECF

Hon. Freda L. Wolfson, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Courtroom 5E  
Trenton, New Jersey 08608

**Re: Scott, et al. v. Brenntag North America, Inc., et al.**  
**Case No. 3:19-cv-335 (FLW) (DEA)**

Dear Judge Wolfson:

This firm, along with the firm of Simon Greenstone Panatier, P.C., represent Plaintiff Sharon Scott as Administrator and Administrator ad Prosequendum of the Estate of Shirley Scott, Deceased in the above matter. Currently pending before the Court is a Motion to Dismiss for Lack of Personal Jurisdiction filed by Defendant Elizabeth Arden, Inc. ("Arden") (ECF No. 5). Plaintiff's opposition is due Tuesday, February 19, 2019. The purpose of this letter, therefore, is to request that the briefing on Arden's motion be stayed until Plaintiff's pending Motion to Remand (ECF No. 3) is decided. On a conference call today with all defense counsel, including counsel for Defendant Arden, Defendants expressed their consent to this request.

Plaintiff originally filed this complaint in the Superior Court of New Jersey on December 18, 2018. On January 10, 2019, Counsel for Arden filed a Notice of Removal of Scott's complaint to this Court, pursuant to Title 28 U.S.C. §§ 1441 and 1332 (ECF No. 1). Plaintiff subsequently filed a Motion to Remand on January 22, 2019 (ECF No. 3), which has not yet been opposed and is presently returnable before Your Honor on February 19, 2019. Plaintiff, by way of this

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adjournment request, seeks to avoid the potentially unnecessary waste of time and resources that the parties and the Court will spend in connection with Defendant Arden's motion to dismiss that may be mooted by Plaintiff's remand motion.

For these reasons, Plaintiff respectfully requests that briefing on the Motion to Dismiss filed by Defendant Arden be stayed pending the outcome of Plaintiff's remand motion. Thank you for your consideration.

Respectfully submitted,

**SZAFERMAN, LAKIND,  
BLUMSTEIN & BLADER, P.C.**

*s/ Robert E. Lytle*  
Robert E. Lytle, Esq.

REL/jwk

c: All counsel of Record (Via Email and Regular Mail)